

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

CR# 03-10362 PBS

SEAN D. STARK

**DEFENDANT SEAN STARK'S REQUEST FOR VOIR DIRE
OF THE PROSPECTIVE JURORS**

Now comes the defendant in the above-captioned matter, SEAN STARK, and moves this Honorable Court, pursuant to Fed. R. Crim. P. 24(a), to examine the prospective jurors by inquiry as follows:

I. Victim of Crime

1. Have you ever been a victim of a crime?

If yes, please describe the incident:

- a. When did it take place?
- b. What was the age, race, national origin, and sex of the perpetrator?
- c. Were the police called?
- d. Was anyone arrested?
- e. Did you testify in court?
- f. What impressions about the police, prosecutors and about the judicial system did you form as a result of your experience?

- g. Were drugs involved in your experience?
- h. Will this experience interfere in any way with your ability to be fair and impartial in this case?

II. Relationship to Law Enforcement Personnel

- 1. Are you related to, or close friends with, any federal agents, police officers, district attorneys, Assistant United States Attorneys, or other law enforcement personnel? If yes:
 - a. Please describe your relationship with this person?
 - b. How often do you see him / her?
 - c. Where does he / she work?
 - d. Does he / she discuss his / her work with you?
 - e. As a result of your contact with this person, what are your impressions about police work / district attorneys' office, United States Attorneys' Office, Department of Justice, etc.?
 - f. Will this relationship interfere in any way with your ability to be fair and impartial in this case?

III. Attitudes and Impressions About Law Enforcement and Criminal Justice System

- 1. What does it mean to you when the police arrest or the government indicts someone?
- 2. Do you think the police could mistakenly or knowingly arrest the wrong

person, or the government could mistakenly or knowingly indict the wrong person? Why or why not?

3. Does the fact that the defendant has been arrested or indicted make you think they did something wrong?
4. Do you believe that a police officer's should be given more weight than the testimony of any other witness?
5. Do you believe that a police officer's or federal agent's testimony should be considered more truthful than the testimony of other witnesses?

IV. Attitudes About Victim / Nature of Crime / Defendant

1. Will the fact that this case involves charges involving conspiracy to distribute marijuana affect your ability to be a fair and impartial juror?
2. Are you related to, or close friends with any person who has been a drug user or addict? If so, would that affect your ability to be a fair and impartial juror?

VI. Presumption of Innocence

1. Does the fact that Sean Stark is charged with a serious crime make you think he must have done something wrong?
2. Do you believe that Sean Stark could be innocent even though he is charged with a serious crime?

Respectfully submitted,
Sean Stark
By his attorney,

Dated: December 1, 2005

/s/ MELVIN NORRIS

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